

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

William Steven Stanaitis,  
Penny Mifflin Stanaitis,  
  
Debtors.

Case No. 23-12187

Chapter 13

Objection to ECF No. 65

**Debtors' Objection to Motion for Relief from the Automatic Stay**

Debtors William Steven Stanaitis and Penny Mifflin Stanaitis, by their attorney, hereby object to the Motion for Relief from the Automatic Stay filed by Movant Hyundai Capital America dba Hyundai Motor Finance. The Court must deny the Motion for the following reasons:

1. The purported arrearage is inconsequential.
2. The Debtors can satisfy the purported arrearage by making curative payments to the Movant through the plan.
3. The Debtors can satisfy the purported arrearage by making curative payments directly to the Movant in a timely manner.

As a result, no grounds for relief exist and the Court must grant relief in the form of order attached, and further in the Debtors' favor if necessary and proper under the law.

Date: April 23, 2024

CIBIK LAW, P.C.  
*Attorney for Debtors*

By: 

Michael I. Assad (#330937)  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102  
215-735-1060  
help@cibiklaw.com

**Certificate of Service**

I certify that on this date I caused this document to be served on all parties on the Clerk's Service List by electronic means through the CM/ECF system.

Date: April 23, 2024

  
Michael I. Assad

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Related to ECF No. 65

**Order Denying Motion for Relief from the Automatic Stay**

The Court having considered the Motion for Relief from the Automatic Stay (ECF No. 65) filed by Hyundai Capital America dba Hyundai Motor Finance, and after notice and opportunity for hearing, it is hereby **ORDERED** that:

1. The motion is **DENIED**.

Date:

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Patricia M. Mayer  
U.S. Bankruptcy Judge